

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE VIRDELL KING AND LAWANDA KING**

**CAUSE NO. 09-12758**

**MOTION TO SURRENDER VEHICLE**

COME NOW the Debtors, Virdell and Lawanda King, by and through the undersigned Attorney, Susan C. Smith, and pray this Honorable Court will permit them to surrender one of their vehicles, and state to wit:

That at the 341 Hearing the Debtors came to the realization that they could not afford the additional vehicle and wish to surrender same. The Debtors pray this Court will permit them to surrender the Chevy Lumina to the lienholder on same, that being First Franklin Financial Corporation. There is no equity in the vehicle, and there is no benefit to the estate to retain the vehicle.

WHEREFORE PREMISES CONSIDERED, the Debtors, Virdell and Lawanda King, by and through the undersigned Attorney, Susan C. Smith, pray this Honorable Court will permit them to surrender the vehicle to First Franklin Financial Corporation in satisfaction of the lien. Further, that if First Franklin Financial Corporation fails to retrieve said vehicle, that the lien on said vehicle be extinguished within thirty (30) days of the Order of this Honorable Court.

And for all else deemed just and equitable, this the 23rd day of September, 2009.

VIRDELL KING AND LAWANDA KING  
/s/Susan C. Smith  
Susan C. Smith, Attorney for Debtors



Of counsel:  
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**CERTIFICATE OF SERVICE**

I, Susan C. Smith, attorney for the Debtors, do hereby certify that I have this day electronically filed or mailed by U. S. Mail, postage prepaid, a true and correct copy of the Motion to Surrender Vehicle to the following at their last known address:

BY ELECTRONIC FILING:

U. S. Trustee [USTPRegion05.AB.ECF@usdoj.gov](mailto:USTPRegion05.AB.ECF@usdoj.gov)

Locke D. Barkley [sbeasley@barkley13.com](mailto:sbeasley@barkley13.com)

BY U. S. MAIL:

First Franklin Financial  
616 N. Applegate St.  
Winona, MS 38967

THIS the 23<sup>rd</sup> day of September, 2009.

/S/SUSAN C. SMITH  
SUSAN C. SMITH, MSBN 99776